

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

INTERROGATORIES OF  
ASSOCIATION FOR POSTAL COMMERCE  
TO USPS WITNESS KIEFER  
(POSTCOM/USPS-T-33-7)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for  
Postal Commerce submits the attached interrogatories to USPS witness Kiefer:  
PostCom/USPS-T-33-7.

Respectfully submitted,

*Ian D. Volner*

Ian D. Volner  
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Counsel for Association for Postal Commerce

October 22, 2001

**POSTCOM/USPS-T33-7.** Please refer to USPS-LR-J-106, BPMWP.xls.

(a) Please confirm that following the process described in (i)-(iii) below produces BPM rates that generate the same total revenue and pound rates that you are proposing and pass through X% of the dropship nontransportation cost avoidances shown in worksheet Inputs, Cells D73-D75. If not confirmed, please describe an approach that will produce BPM rates that meet these criteria.

(i) Set Cells I39-I55 on worksheet Rate Adjustments equal to 0.

(ii) Set Cell F53 on worksheet Pound and Piece Charges equal to "+Revenue Leakages"!I34-'Rate Adjustments'!N57"

(iii) Set Cells G25-G30 on worksheet Revenue Leakages equal to X%.

(b) Please confirm that following the approach described in subpart (a) produces the piece rates for Basic Presort BPM that are shown in Table 1 below.

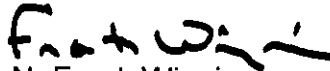
**Table 1. BPM Basic Presort Rates Based Upon Selected Passthroughs**

Entry	Passthroughs						
	70%	75%	80%	85%	90%	95%	100%
Origin	\$1.185	\$1.201	\$1.218	\$1.235	\$1.251	\$1.268	\$1.284
DBMC	\$0.862	\$0.856	\$0.849	\$0.843	\$0.836	\$0.830	\$0.823
DSCF	\$0.670	\$0.650	\$0.630	\$0.610	\$0.590	\$0.570	\$0.549
DDU	\$0.590	\$0.565	\$0.539	\$0.513	\$0.487	\$0.461	\$0.435

(d) Please confirm that by following the method discussed in subpart (a) above and varying Cells M39-M55 on worksheet Rate Adjustments, one can produce rates that generate the same total BPM revenue as your proposed rates, pass through the desired percentage of the dropship nontransportation cost avoidances, and adjust BPM pound rates as desired. If not confirmed, please explain fully.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document upon all participants of record to date in this proceeding in accordance with section 12 of the rules of practice.



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